



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 6, 2023

By ECF

The Honorable Sanket J. Bulsara
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: LoCurto v. United States, 10-CV-4589 (NGG) (SJB)
Related to United States v. LoCurto, 03-CR-1382 (NGG)

Dear Judge Bulsara:

The government respectfully submits this letter setting forth its final list of proposed witnesses at the evidentiary hearing scheduled in the above-captioned case. The government intends to call Harry Batchelder, Esq., and, with the Court's permission, will make arrangements for Mr. Batchelder to testify at the hearing remotely from a federal building in the District of New Hampshire. In addition, depending on the defendant-petitioner's presentation of evidence, the government may call Special Agent Joseph Costello of the Federal Bureau of Investigation as a witness.

At the upcoming hearing, the government will seek to admit materials filed on the above-captioned docket, as well as transcripts and other information filed on the dockets of the following cases in the United States Court of the Eastern District of New York: United States v. Urso, et al., 03-CR-1382 (S-1) (NGG), United States v. LoCurto, et al., 00-CR-146 (RR), and United States v. LoCurto, et al., 02-CR-307 (NGG). See ECF Docket Entry No. 171 (enclosing proposed stipulation referencing approximately eighty exhibits). The government does not intend to call a witness from the Clerk's Office in order to admit

these materials. To the extent that counsel for Mr. LoCurto objects to the admission of these materials, the government requests that counsel make such objection in sufficient time for the Court to rule on their admissibility prior to the hearing.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/
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cc: Counsel for the defendant-petitioner (by ECF and email)